

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
v	§	
	§	
CHRISTOPHER MERHAN,	§	CRIMINAL NO. 4:97-CR-191-05
Defendant,	§	
	§	
and	§	
JPMORGAN CHASE BANK, N.A.,	§	
Garnishee.	§	

**JPMORGAN CHASE BANK, N.A.'S ORIGINAL ANSWER
TO WRIT OF GARNISHMENT**

JPMorgan Chase Bank, N.A., a Garnishee in the above-captioned cause, files this Original Answer to the Writ of Garnishment issued on April 10, 2014, and would respectfully show the Court as follows:

1. The Writ was served upon Garnishee on April 28, 2014, via its registered agent, CT Corporation System, Dallas, Texas.

2. At the time the Writ was served on it and today, Garnishee had possession, custody or control of the following property (non-earnings) in which Christopher Merhan and/or his spouse ("Defendant") has an interest:

Savings account #---9717 "Christopher P. Merhan"	\$75.13
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3. Garnishee has no way of anticipating of what property it will have possession, custody or control in the future in which Defendant has an interest other than the amount of the bank account set forth in the preceding paragraph.

WHEREFORE, JPMorgan Chase Bank holds the sum SEVENTY-FIVE AND 13/100 DOLLARS (\$75.13), pending the disposition of this cause, and respectfully requests that, on final hearing of this cause, the following relief:

(i) That all claims to such sum be determined and adjudicated, and that Garnishee be discharged from all liability to Plaintiff and Defendant respecting this fund.

(ii) Such other and further relief, general or special, at law or equity, to which Garnishee may show itself justly entitled.

Respectfully submitted,

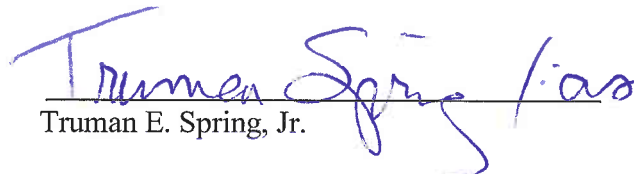
**Truman E.
Spring, Jr.**

Digitally signed by Truman E. Spring, Jr.
DN: cn=Truman E. Spring, Jr., o=Spring
Law Firm, ou,
email=tspring@springlawfirm.com,
c=US
Date: 2014.05.07 11:43:29 -05'00'

Truman E. Spring, Jr.
Texas Bar No. 18966550
Federal Bar No. 16419
SPRING LAW FIRM
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The Adolphus Tower
Dallas, Texas 75202
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ATTORNEY FOR JPMORGAN CHASE BANK, N.A.

CERTIFICATE OF INTERESTED PERSONS

Garnishee adopts the Certificate of Interested Persons filed herein by the United States of America on April 4, 2014.


Truman E. Spring, Jr.

VERIFICATION

STATE OF OHIO

§

§

COUNTY OF FRANKLIN

§

My name is Kyle Jackson. I am an authorized representative for JPMorgan Chase Bank, N.A., herein named Garnishee. I have read the foregoing Original Answer to Writ of Garnishment as such representative of the Bank. Based upon the Bank's records concerning this matter, I have personal knowledge of all factual statements therein contained, and such statements are true and correct.

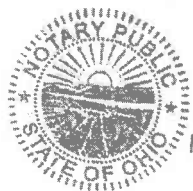


Kyle Jackson, Authorized Representative
JPMorgan Chase Bank, N.A.

1 SUBSCRIBED AND SWORN TO before me, the undersigned Notary Public, on this the day of May, 2014, to certify which witness my hand and official seal.



Notary Public in and for the State of Ohio



MONICA L. TALBERT
Notary Public, State of Ohio
My Comm. Expires June 16, 2018

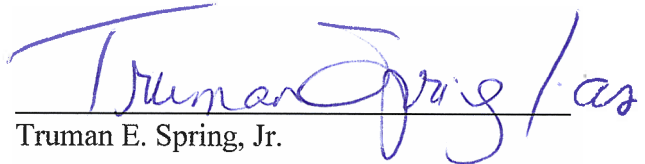
CERTIFICATE OF SERVICE

I certify that on May 9 2014, I served a true and correct copy of the foregoing pleading upon the following parties of record:

Martha Minnis
Assistant United States Attorney
1000 Louisiana Street, Suite 2300
Houston, Texas 77002
Via telephonic document transfer to (713) 718-3405

Christopher Merhan
18407 Vanhorn Court
Spring, Texas 77379
Via first class mail

Amanda Merhan
18407 Vanhorn Court
Spring, Texas 77379
Via first class mail


Truman E. Spring, Jr.